

FILED

JAN 19 2017

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY _____, DEPUTY

Plaintiff(s)

Ellis, Dominique S.

vs.

Defendant(s)

Regents for the Oklahoma State University
And Agricultural and Mechanical Colleges

CIV 17

58 M

CASE NO. _____

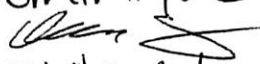
COMPLAINT

Dominique Ellis ("The Plaintiff"), on behalf of himself is attempting to recover \$61,539.46 in unpaid hourly, overtime compensation, and benefits from his former employer, Northeastern Oklahoma Agriculture and Mechanical College ("NEO" or "The Defendant").

The Regents for the Oklahoma State University And Agricultural and Mechanical Colleges has the supervision, management and control of the operations of NEO. The Defendant hired The Plaintiff as a football coach and paid him on a monthly basis. Despite The Plaintiff meeting the qualifications of non-exempt employee status under the FLSA, The Defendant permitted the Plaintiff to routinely work more than forty (40) hours in a work week without paying the mandatory \$7.25 minimum wage rate, overtime premium for any of overtime hours worked, or provide healthcare coverage. The foregoing conduct, as alleged, constitutes a willful violation of the Fair Labor Standards Act, as well as the Affordable Care Act.

The Defendant knew or showed reckless disregard for the fact that their compensation practices were in violation of Federal laws. In addition, the Defendant never kept records of hours worked by The Plaintiff. The Defendant unlawfully misclassified the Plaintiff as; graduate assistant, assistant coach, part time coach, and volunteer to avoid its obligations to pay minimum wage, provide healthcare coverage, or pay overtime, and to reap the benefits of such illegal classification such as reduced tax liability, avoiding workers' compensation, and passing its operating costs on its workforce.

The Plaintiff brings this action on behalf of himself against NEO for violations of the Fair Labor Standards Act, 29 U.S. Code § 206 and U.S. Code § 207 ("FLSA") and H.R. 3590 (111th): Patient Protection and Affordable Care Act.

Dominique Ellis - Pro SE

811 Arapaho Dr
Burkburnett, TX 76354
(210) 438-3633

NOTE: Your signature, address and phone number must appear at the end of each pleading.

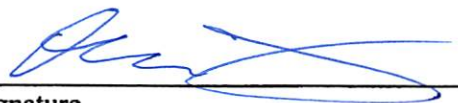
Pro Se Litigant's Certificate of Service



I hereby certify that on (date) 1-19-17, I filed the attached document with the Clerk of Court. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the Electronic Case Filing System.



I hereby certify that on (date) _____, I filed the attached document with the Clerk of Court and served the attached document by (service method) _____ on the following, who are not registered participants of the Electronic Case Filing System: (insert names and addresses)


Signature